



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

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*The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007*

November 23, 2015

**BY ECF**

The Honorable Vernon S. Broderick  
United States District Judge  
40 Foley Square  
New York, NY 10007

**Re: *United States v. John W. Ashe, et al.*,  
15 Cr. 706 (VSB)**

Dear Judge Broderick:

The Government respectfully writes, as requested by the Court at the first conference in the above-captioned matter, to (a) advise the Court that it presently intends to make a motion pursuant to Section 4 of the Classified Information Procedures Act ("CIPA"), which the Government expects to request be filed under seal and *ex parte*, as provided for by CIPA, the basis for which request will be set forth in the motion, and (b) propose that such a motion be made on or about February 22, 2016, to allow sufficient time for counsel to the Government to complete review of potentially relevant, classified materials and the relevant components of the Government to obtain necessary approvals and declarations for the filing. If the Court would like further information or has questions regarding these potentially relevant, classified materials or the steps expected to be undertaken in advance of the Government making its motion, the Government is prepared to file a separate classified, *ex parte* letter or to meet with the Court *in camera* as contemplated under CIPA.

Respectfully submitted,

PREET BHARARA  
United States Attorney

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cc: (by ECF)

All Counsel of Record